

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF EAST KENTUCKY POWER)
COOPERATIVE, INC. FOR A CERTIFICATE OF)
CONVENIENCE FOR THE CONSTRUCTION OF)
A 278 MW (NOMINAL) CIRCULATING FLUIDIZED)
BED COAL FIRED UNIT IN MASON COUNTY)

CASE NO. 2004-00423

REQUEST FOR INFORMATION POSED BY THE ATTORNEY GENERAL

Comes now the intervenor, the Attorney General of the Commonwealth of Kentucky, by and through his Office of Rate Intervention, and submits this Request for Information to East Kentucky Power Cooperative, Inc. to be answered by the date specified in the Commission's Order of Procedure, and in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from the Office of Attorney General.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the Office of the Attorney General as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company, please state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

Respectfully submitted,

GREGORY D. STUMBO
ATTORNEY GENERAL



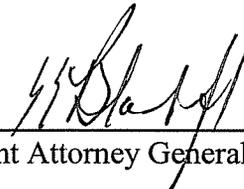
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NOTICE OF FILING AND CERTIFICATE OF SERVICE

Notice is hereby given that the original and seven true copies of the foregoing have been filed with the Executive Director of the Kentucky Public Service Commission by hand delivery to 211 Sower Boulevard, Frankfort, Kentucky 40601, this the 2nd day of December, 2004. I further certify that this same day the parties have been served by mailing a true copy, postage prepaid, to Counsel of Record as follows:

HON CHARLES A LILE
SENIOR CORPORATE COUNSEL
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Assistant Attorney General

Requests for Information Posed
By the Attorney General to EKPC
Case No. 2004-00423

1. In response to Commission Staff's Request dated 12/07/04, request 3, EKPC stated in part: "...more generating units can provide faster system response to load fluctuations, and, in addition, loads such as Gallatin steel will represent a smaller proportion of the total EKPC load. The end result is that EKPC will be able to better handle load-following for existing and future large industrial loads." Please give a basic description of what load fluctuations are anticipated for large industrial loads so as to require load following and how baseload units participate in that load following or are used in planning for the need for such load following.

2. In response to Commission Staff's Request dated 12/07/04, request 4, EKPC stated that the length of the RUS loan for coal-fired generation projects will normally match the economic life of the assets being acquired, but that the length of the loan will not usually be allowed to exceed the end of the Wholesale Power Contract (WPC) term between EKPC and its member cooperatives.

a. Are the terms of the member cooperatives' Wholesale Power Contracts individual and set to expire at different times, or do they expire at the same time?

b. If they expire at individual times, is the term of any one WPC or set of WPCs the determining factor for this RUS loan? If so, which WPC(s) are involved and when are they due to expire?

3. In response to Commission Staff's Request dated 12/07/04, request 6, EKPC stated that Fleming-Mason Energy Cooperative and one other member cooperative have an interest in pursuing a partial requirements contract with EKPC whereby they could purchase a portion of their future load growth from another power source. What impact would the utilization of the less than full requirements contracts for member cooperatives have on the planning scenarios utilized by EKPC for its generation additions in this application and over the next 5 years and the next 10 years?